

1 Honorable David G. Estudillo  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 John Doe,  
10 Plaintiff,  
11 v.  
12 Kristi Noem, *et al.*  
13 Defendants.

No. 2:25-cv-00633-DGE  
Plaintiff's Supplemental Brief  
on Irreparable Harm  
in Support of Preliminary Injunction

14 On May 1, 2025, the Court directed Plaintiff Doe to submit a fact-focused supplement  
15 on the irreparable harms he faces. Doc. 31. Plaintiff Doe's supplement is supported by his May  
16 2, 2025 supplemental declaration (Doc. 33 with Exs. D–E) (hereinafter "Doe-2 Decl.") and the  
17 supplemental declaration of Vice-Dean Sakiyama-Elbert (Doc. 34) (hereinafter "Sakiyama-2  
18 Decl.").

19 Mr. Doe firmly believes that without a preliminary injunction, the Defendants will re-  
20 terminate his status and place him in removal proceedings which would immediately cause  
21 irreparable harms. The following is a summary of the irreparable harms that Mr. Doe will suffer  
22 if the requested Motion for Preliminary Injunction is not granted.

Mr. Doe notes also that another court issued a Preliminary Injunction in another SEVIS case.<sup>1</sup>

## Irreparable Harms:

1. Academic & Research – Loss of lab access, datasets, and equipment would freeze Doe’s dissertation, three near-publication manuscripts, critical lab-system upgrades designed and to be implemented by Doe in June, and a May 14 science conference presentation. Doe-2 Decl. ¶¶ 4, 11-14; Sakiyama-2 Decl. ¶¶ 3-6.
2. Career & Immigration Trajectory – Re-termination will nullify Doe’s accepted job offer as a Research Scientist for Meta, will cancel his one-time post-completion OPT, and will require him to repeat 3-4 years of research if transfer became his only option. Doe-2 Decl. ¶¶ 15-16; Sakiyama-2 Decl. ¶¶ 4-5; Vice-Dean Sakiyama Apr. 23 Decl., Doc. 22 ¶ 5 (hereinafter “Sakiyama-1 Decl.”).
3. Financial & Institutional Impact – Immediate loss of Doe’s tuition and living expenses stipend, and immediate delays to critical UW research grants reliant on Doe’s expertise. Doe-2 Decl. ¶ 17; Sakiyama-2 Decl. ¶ 6; Sakiyama-1 Decl. ¶ 6.
4. Health & Family – Stress-induced abdominal pathology, loss of insurance, indefinite postponement of wedding and fertility treatments that have already started. Doe-2 Decl. ¶¶ 7, 18-20.
5. Regulatory Limbo & Detention Risk – An “OTHER” termination has no statutory cure; ICE may compel immediate departure without a grace period, chilling all travel and collaboration. Doe-2 Decl. ¶ 5; Decl. of Alisa Sweet, Doc. 21 ¶¶ 12-13, 30-33.

<sup>1</sup> See *Rodriguez v. Noem*, No. 3:25-cv-616-SRU, Preliminary Injunction Order (May 1, 2025), available at [https://ecf.ctd.uscourts.gov/cgi-bin/show\\_public\\_doc?2025cv0616-30](https://ecf.ctd.uscourts.gov/cgi-bin/show_public_doc?2025cv0616-30) (accessed May 2, 2025).

1       These harms are present, concrete, and irreparable. Loss of research progress,  
2 publications, OPT eligibility, professional opportunities, health insurance, and family-planning  
3 windows cannot be compensated by monetary damages after the fact. Injunctive relief  
4 preserving Plaintiff's active SEVIS status is necessary to prevent cascading academic,  
5 professional, medical, and personal injuries and to maintain the status quo pending final  
6 adjudication. Plaintiff's family-planning, personal health, and educational plan have already  
7 been harmed by Defendants' first termination of his SEVIS status. A second termination of his  
8 status would multiply those injuries both to himself and those dependent on his research, as  
9 well as his fiancée, causing severe and long-lasting harms that cannot be simply remedied.  
10 Therefore, it is paramount that this Court issue a preliminary injunction preserving the status  
11 quo of Plaintiff's active SEVIS status while this case is ongoing.

12       Respectfully submitted this 2nd Day of May, 2025.

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14       GAIRSON LAW, LLC

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23       Counsel for Plaintiff John Doe

## **Certificate of Service**

I certify that on May 2, 2025, I electronically filed the foregoing document, together with all attachments, with the Clerk of the Court for the Western District of Washington using the CM/ECF system. I further certify that this memorandum contains 476 words, in compliance with the local rules.

*/s/ Devin T. Theriot-Orr*  
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